



Shapiro Arato Bach LLP

1140 Avenue of the Americas, 17th Floor, New York, NY 10036
phone: 212-257-4880 | fax: 212-202-6417
www.shapiroarato.com

Alexandra A.E. Shapiro
ashapiro@shapiroarato.com
Direct: 212-257-4881

April 1, 2025

VIA ECF

The Honorable Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Trevor Milton*, 21-cr-478 (ER)

Dear Judge Ramos:

We write in response to the Court's request for a joint status letter regarding the pardon recently issued to Defendant Trevor Milton by President Donald Trump and its impact on applications currently pending before the Court.

On March 27, 2025, President Trump issued Mr. Milton "A Full and Unconditional Pardon," including "remission of any and all fines, penalties, forfeitures, and restitution ordered by the court" in this action. The pardon, which Mr. Milton has accepted, "reaches both the punishment prescribed for the offence and the guilt of the offender; and when the pardon is full," as is the case here, "it releases the punishment and blots out of existence the guilt, so that in the eye of the law the offender is as innocent as if he had never committed the offence." *Ex parte Garland*, 71 U.S. 333, 380 (1866). Thus, the pardon covers the financial aspects of the conviction such as the pending request for restitution, as well as all other penalties. A true and correct copy of the pardon is attached as Exhibit A.

We have consulted with government counsel, and the parties agree that Mr. Milton's pending motion for a new trial on Count Four (Dkt. 344) and the government's request for restitution (Dkt. 361) are both now moot and need not be resolved by the Court. The parties will jointly move in the Second Circuit to dismiss the appeal as moot. The parties also agree that, given the pardon, the Court should exonerate Mr. Milton's bail, including any liens on property posted in connection with his bail, and direct the government and/or pretrial services to return Mr. Milton's passport. In addition, Mr. Milton is entitled to the return of the \$300 special assessment, which he has paid to the Court.

Hon. Edgardo Ramos
April 1, 2025

Respectfully submitted,

/s/ Alexandra A.E. Shapiro

Alexandra A.E. Shapiro

Daniel J. O'Neill

Avery D. Medjuck

SHAPIRO ARATO BACH LLP

1140 Avenue of the Americas, 17th Floor

New York, New York 10036

(212) 257-4880

ashapiro@shapiroarato.com

doneill@shapiroarato.com

amedjuck@shapiroarato.com

Marc L. Mukasey

Torrey K. Young

MUKASEY YOUNG LLP

570 Lexington Avenue, Suite 3500

New York, New York 10022

(212) 466-6400

Marc.Mukasey@mukaseylaw.com

Torrey.Young@mukaseylaw.com

cc: All counsel (by ECF)